

REMARKS

In the Office Action, claims 1-18 were rejected and claims 19-31 were withdrawn from consideration. By the present response, claims 19-31 are canceled. Upon entry of the amendments, claims 1-18 will be pending in the application. Reconsideration and allowance of all pending claims are requested.

Election/Restriction

In the Office Action, the Applicants note that the examination has been restricted to claims 1-18. Accordingly, claims 19-31 have been canceled.

Double Patenting Rejection

Applicants note that claims 1-18 have been provisionally rejected under the judicially created doctrine of obviousness-type double patenting. However, because the copending application has not been allowed, Applicants will respond to a provisional double patenting rejection following final disposition of one or both applications.

Rejections Under 35 U.S.C. § 102

Claims 1-18 are rejected under 35 U.S.C. § 102(b) as being anticipated by Countrywood et al. (U.S. Patent No. 6,110,540 A), hereinafter, "Countrywood"). Of these, claims 1, 9 and 15 are independent.

All of the independent claims recite, in generally similar language, a gas supply line that supplies a gas. The gas is delivered to a powered electrode and is converted to plasma in the vacuum chamber, hence the qualification of the device as a plasma enhanced chemical vapor deposition (PECVD) system. Specifically, claim 1 recites a gas inlet line for delivering a gas to a powered electrode. Similarly, claims 9 and 15 recite a heated gas inlet line. The operation of the gas inlet is described, *inter alia*, in paragraph 11 of the application:

The invention includes a delivery device for a thin film deposition or etching apparatus containing a heated gas inlet line for delivering a gas to a powered electrode of the apparatus, the gas inlet line maintained under a vacuum and a coupling device located between the powered electrode and the gas inlet line, the coupling device comprising insulation portion. The invention also includes a system for delivering a gas to a thin film deposition or etching apparatus with the system containing a heated gas inlet line maintained under a vacuum and a coupling device located between a powered electrode of the apparatus and the gas inlet line wherein the coupling device comprises the thermal and electrical insulation portion.

Application, paragraph 11, lines 1-9.

Countrywood does teach a gas supply, but it is not in the electrode structure shown in Fig. 3B. Rather, the gas supply is shown in Fig. 1 of Countrywood, and designated by element numeral 22. This actual gas supply 22: (1) is not heated; (2) does not deliver gas to an electrode; and (3) is not isolated from a charged electrode. Countrywood uses a completely different approach to a PECVD system. In Countrywood, the gas is delivered separately from a *plasma source*. The gas itself is not delivered to the electrode at all.

Moreover, the electrode arrangement of Countrywood, discussed by the Examiner, is not equivalent to a gas supply as claimed. The claimed gas supply is used to provide the very gas that is converted to plasma in the chamber. The electrode of Countrywood, shown in Fig. 3B, does not deliver a gas at all. Rather, it creates plasma within the structure, and delivers plasma into the chamber.

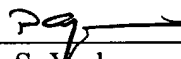
Hence, the PECVD system claimed cannot be anticipated by the PECVD system of Countrywood. Again, the actual gas delivery system of Countrywood is not heated or isolated from an electrode. Secondly, the plasma electrode discussed by the Examiner is not the gas source, and is not equivalent to a gas source, as the system requires a separate gas source, and the electrode delivers a plasma.

Conclusion

In view of the remarks set forth above, Applicants respectfully request allowance of the pending claims. If the Examiner believes that a telephonic interview will help speed this application toward issuance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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